

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INVENSAS CORPORATION and TESSERA
ADVANCED TECHNOLOGIES, INC.,

Plaintiffs,

v.

NVIDIA CORPORATION,

Defendant.

C.A. No. 19-861-RGA

**DEFENDANT'S NOTICE OF INSTITUTION OF *INTER PARTES* REVIEW
PETITIONS BY THE PATENT OFFICE**

Plaintiffs Invensas Corporation and Tessera Advanced Technologies, Inc. assert that Defendant NVIDIA Corporation (“NVIDIA”) infringes U.S. Patent Nos. 6,232,231 (“the ’231 patent”), 6,849,946 (“the ’946 patent”), 7,064,005 (“the ’005 patent”) and 6,317,333 (“the ’333 patent”) (collectively, the “Asserted Patents”) in this case.

On May 5, 2020, NVIDIA provided notice that it filed three *inter partes* reviews (“IPRs”) with the U.S. Patent Office Patent Trial and Appeal Board (“PTAB”) covering every asserted claim of three of the four currently asserted patents.¹ D.I. 146. NVIDIA hereby provides notice that the PTAB has instituted all three IPR proceedings on every asserted claim of those three asserted patents.

NVIDIA intends to file a motion to stay the litigation in light of the IPR proceedings within a few days. Plaintiffs have not yet provided their position as to this motion. A Markman hearing is scheduled in this case on October 13, 2020. D.I. 188.

¹ Plaintiffs’ allegations regarding U.S. Patent No. 5,666,046 were dismissed with prejudice on May 5, 2020. (D.I. 143.)

Attached as Exhibits A-C are the institution decisions for the three IPRs. The institution dates are identified in the below chart:

Exhibit No.	IPR Proceeding No.	Patent	Institution Decision Date
A	IPR2020-00603	'231 patent	September 3, 2020
B	IPR2020-00602	'946 patent	September 3, 2020
C	IPR2020-00708	'333 patent	September 2, 2020

Dated: September 4, 2020

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